CONSTRUCTION PERMIT -- REVISED

PERMITTEE

3M Company

Attn: Sumitra Ness

P.O. Box 33331, Bldg. 41-01-05 St. Paul, Minnesota 55133-3331

Application No.: 81070016 I.D. No.: 161807AAA

Applicant's Designation: Date Received: February 13, 2003

Subject: Downstream Equipment

Date Issued:

Location: 22614 Route 84 North, Cordova

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of downstream equipment for existing HFE processes (including existing systems 20-12, 20-21, 20-22, 20-31, 20-33, 20-34, 20-41, 20-50, 20-60, 20-73, 20-90, 20-93, and 20-95) as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

- 1. Operation of the emission source(s) included in this permit shall not begin until all associated air pollution control equipment has been constructed and is operational.
- 2a. This permit is issued for collecting intermediate product streams of all the existing cell systems and processing them in the downstream equipment to recover salable byproduct.
- b. Emissions from the downstream equipment shall not exceed the following limits:

	(Tons/Month)	(Tons/Year)	Notes
VOM	8.00	47.0	1
Other Organic Material (NONVOM)		1000.0	2

Notes:
1. For purpose of this permit, organic material that meets the definition of photochemically reactive material in IAC 211.4690 shall comply with 35 IAC 215.301 by demonstrating 85% or more reduction in the uncontrolled organic material emission, or organic material emissions less than or equal to 8 lb/hour. Organic material emissions that do not meet the definition of photochemically reactive material as defined in 35 IAC 211.4690 are exempt from 35 IAC 215.301.

2. For the purpose of this permit, other organic material (NONVOM) is organic material as defined in 35 IAC 211.4250 that does not qualify as volatile organic material, hazardous air pollutants, ozone depleting substances or photochemically reactive organic material.

These limits are based on the maximum emission rates indicated in the permit application.

- 3. This permit is issued based on negligible emissions of hydrogen fluorides and fluorides from downstream equipment. For this purpose, emissions shall not exceed nominal emission rates of 0.1 lb/hour and 0.44 tons/year. For this purpose, fluorides means fluorides as measured by USEPA Method 13A (40 CFR Part 60, Appendix A), which would include VOM compounds that are called "acid fluorides".
- 4. As a result of the above limits and other conditions in this permit, this permit is issued based on the downstream equipment not constituting a major modification subject to Prevention of Significant Deterioration (PSD), 40 CFR 52.21, because the net increase in VOM emissions is 39.0 tons/yr after modification and are less than PSD significant threshold.
- 5a. The Permittee shall maintain records of the following process information for the downstream equipment:
 - i. The volatile organic material (VOM) content of materials used in the downstream equipment.
 - ii. The maximum hourly emission rates of VOM and NONVOM for each product or categories of products, based on design calculations for the downstream equipment with supporting information.
 - iii. Detailed process design information for consumption of VOM in raw material by the system, if the Permittee assumes that only a fraction of the VOM in raw materials is emitted to the atmosphere as VOM.
- b. The Permittee shall maintain the following operating records for the downstream equipment:
 - i. Production of the material, by category or subcategory of product, as necessary to determine VOM emissions of the downstream equipment.
 - ii. Operating hours of each process trains in the downstream equipment by product or category of product.
- c. The Permittee shall maintain the following records related to annual emissions of the downstream equipment:

- Emissions of VOM, determined from the above records.
- ii. Emissions of NONVOM determined as the product of system operating hours and design emission rates, as recorded above.
- 6. All records required by this permit shall be maintained for at least three years and shall be available for inspection and copying by the Illinois EPA.
- 7. The Permittee's annual report submitted to the Illinois EPA shall include:
 - a. Data on emissions of NONVOM from the downstream equipment along with data for emissions of other products.
 - b. A listing of any periods during the previous year when any limit contained in this permit was exceeded including detailed explanation of the cause for exceedance.
- 8. All required notifications and reports shall be sent to the following address unless otherwise indicated:

Illinois Environmental Protection Agency Division of Air Pollution Control Compliance Section (#40) P.O. Box 19276 Springfield, Illinois 62794-9276

It should be noted that this permit has been revised to increase the limit in the permit for emissions of VOM and NONVOM, which is not otherwise restricted by applicable emission standards. The Permittee must promptly submit a revision to its pending CAAPP application, including a revised CAAPP 292 form, to reflect the higher emissions now allowed by this permit.

It should also be noted that this permit addressed modifications to existing equipment that was covered by Operating Permits 85010039, 93070024, 94040129, 76010105, and 91100009.

If you have any questions on this, please call Minesh Patel at 217/782-2113.

Donald E. Sutton, P.E. Manager, Permit Section Division of Air Pollution Control

DES:MVP:jar

cc: Region 2